

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN**

In re:

EDWARD CARL & SUSAN PEDERSEN,

Case No. 21-11797-cjf

Debtors.

OBJECTION TO MOTION TO DISMISS

Edward Carl and Susan Pedersen (the “Debtors”), by their attorneys, Krekeler Law, S.C., hereby object to the Chapter 13 Trustee’s Motion to Dismiss. In support of this objection, the Debtors state and represent the following:

1. The Debtors are working to cure the amount in default of \$461.97 in addition to the monthly plan payment in the amount of \$160.00, or in the alternative, modify their Chapter 13 Plan to cure the delinquency.
2. Debtor Susan Pedersen is permanently disabled and requires full-time care from Debtor Edward Pedersen. Mr. Pedersen receives compensation for caring for Ms. Pedersen. However, Ms. Pedersen has been hospitalized in recent months, during which time Mr. Pedersen is not entitled to receive compensation.

The Debtors respectfully request a hearing on the Motion.

Dated this 20th day of August 2024.

KREKELER LAW, S.C.

By: /s/ Noe J. Rincon
Noe J. Rincon
State Bar No. 1124893
Attorneys for Debtors,
Edward Carl & Susan Pedersen

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